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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. _____

AUG 21 2020

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,
v.

INFORMATION
18 U.S.C. § 844(i)
18 U.S.C. § 371

ALEXANDER STEVEN HEIL,
Defendants.

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Arson)

1. On or about May 28, 2020, in the State and District of Minnesota, the defendant,

ALEXANDER STEVEN HEIL,
knowingly and willfully conspired and agreed with M.G. to commit arson on property used in interstate commerce, in violation of Title 18, United States Code, 844(i), all in violation of Title 18, United States Code, Section 371.

PURPOSE OF THE CONSPIRACY

2. The purpose of the conspiracy was to commit an act of arson at the Wells Fargo Bank building located at 3030 Nicollet Ave. South, in the City of Minneapolis, in the District of Minnesota.

MANNER AND MEANS

3. It was part of the conspiracy that on May 28, 2020, defendant Alexander Heil joined other individuals who had gathered at 3030 Nicollet Ave. South, City of



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Minneapolis, in the District of Minnesota and thereafter engaged in conduct designed to accelerate a fire in the Wells Fargo Bank building at 3030 Nicollet Ave. South, in the City of Minneapolis, in the District of Minnesota.

OVERT ACTS

4. In furtherance of the conspiracy and to achieve its objects, the defendant committed, directly and through coconspirators, certain overt acts, including but not limited to the following:

5. On or about May 28, 2020, the defendant placed a traffic cone into an existing fire for the purpose of accelerating the fire in the Wells Fargo Bank building located at 3030 Nicollet Ave. South in the City of Minneapolis and District of Minnesota.

6. On or about May 28, 2020, the defendant manipulated the existing fire in the entrance to the bank building for the purpose of accelerating the fire in the Wells Fargo Bank building located at 3030 Nicollet Ave. South in the City of Minneapolis and District of Minnesota.

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7. On or about May 28, 2020, the defendant threw an unknown object into the existing fire for the purpose of accelerating the fire in the Wells Fargo Bank building located at 3030 Nicollet Ave. South in the City of Minneapolis and District of Minnesota.

All in violation of Title 18, United States Code, Section 371.

Date: August 21, 2020

ERICA H. MACDONALD
United States Attorney

/s/Andrew R. Winter
ANDREW R. WINTER
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